

# Exhibit 48

Deposition of Dana F. White  
(August 9, 2017 – Vol. 1)  
(excerpted)

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON )  
FITCH, on behalf of )  
themselves and all others )  
similarly situated, )  
Plaintiffs, )  
vs. ) Case No.  
ZUFFA, LLC, d/b/a Ultimate ) 2:15-cv-01045-RFB-(PAL)  
Fighting Championship and )  
UFC, )  
Defendant. )  
\_\_\_\_\_  
)

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF DANA F. WHITE

MORNING AND AFTERNOON SESSIONS

LAS VEGAS, NEVADA

AUGUST 9, 2017

9:30 a.m.

REPORTED BY:  
CYNTHIA K. DuRIVAGE, CSR #451  
JOB NO. 51036-A

	186		188
1	<b>DANA WHITE - HIGHLY CONFIDENTIAL</b>	1	<b>DANA WHITE - HIGHLY CONFIDENTIAL</b>
2	A. Correct.	2	of, then. There's been many.
3	<b>Q. Let me hand you what the I've marked as</b>	3	(Exhibit 42 was marked for
4	<b>Exhibit 41. Please take a look at that.</b>	4	identification by the reporter.)
5	[REDACTED]	5	MR. DELL'ANGELO: All right. Why don't we
	[REDACTED]	6	mark as Exhibit 42 a video clip that I'll play from
	[REDACTED]	7	September 23, 2007. It's a UFC 76 post fight press
	[REDACTED]	8	conference in Anaheim, California.
	[REDACTED]	9	MR. ISAACSON: Is this an excerpt?
	[REDACTED]	10	MR. DELL'ANGELO: Yes, it is.
	[REDACTED]	11	MR. ISAACSON: I'll object on the grounds
	[REDACTED]	12	of completeness to the use of this exhibit in
	[REDACTED]	13	question.
	[REDACTED]	14	(Video clip played.)
	[REDACTED]	15	UNIDENTIFIED SPEAKER: Can I get your
	[REDACTED]	16	thoughts on, say, Bodog and EliteXC and how you feel
	[REDACTED]	17	they stack up --
	[REDACTED]	18	DANA WHITE: They suck.
	[REDACTED]	19	(Laughter.)
	[REDACTED]	20	DANA WHITE: You know, I'll be honest. I
	[REDACTED]	21	think that, you know, I'm not impressed with any
	[REDACTED]	22	newcomer. But I'll tell you what. The last -- the
	[REDACTED]	23	last ProElite show looked better than any of the
	[REDACTED]	24	other ones they had done --
	[REDACTED]	25	THE REPORTER: I can't hear it.
	187		189
1	[REDACTED]	1	<b>DANA WHITE - HIGHLY CONFIDENTIAL</b>
	[REDACTED]	2	DANA WHITE: I actually saw the end -- at
	[REDACTED]	3	the end of it, I saw the Robbie Lawlor -- the Lawlor
	[REDACTED]	4	fight. But again, you're talking about the lower
	[REDACTED]	5	level, the lower tier, Robbie Lawlor. I like Robbie
	[REDACTED]	6	Lawlor. I'm the one that brought him into the UFC,
	[REDACTED]	7	and he's not in the UFC because he lost three in a
	[REDACTED]	8	row. And Ninja wasn't even ranked, and he has a
	[REDACTED]	9	title. So, you know, you're talking about lower,
	[REDACTED]	10	lower, lower level. I mean, if you picked all those
	[REDACTED]	11	shows, you know, to be a No. 2, they're so far,
	[REDACTED]	12	No. 2, it's not even funny. And I'm just being
	[REDACTED]	13	honest now. I'm not being a wise-ass.
11	<b>Q. Okay. You can set that aside.</b>	14	UNIDENTIFIED SPEAKER: So you don't feel
12	<b>Are you familiar with the former MMA</b>	15	there's competition (inaudible)?
13	<b>promoter EliteXC?</b>	16	DANA WHITE: No. Competition? No.
14	A. Yes.	17	Competition? No. Not at all. I think there are --
15	<b>Q. Is there a time when you thought of EliteXC</b>	18	they're necessary. We need those shows because, you
16	<b>as a low level promoter that didn't compete with the</b>	19	know, fighters are getting paid, fighters are
17	<b>UFC?</b>	20	fighting and getting experience and guys are going to
18	A. EliteXC, yeah. Yeah, I who they are. I	21	come up and fight in the UFC some day.
19	was mistaking them for somebody else at first. It's	22	UNIDENTIFIED SPEAKER: So you look at them
20	a T-shirt company.	23	more as like developmental leagues?
21	<b>Q. Are you thinking of Affliction?</b>	24	DANA WHITE: Huh?
22	A. No. Different one.	25	UNIDENTIFIED SPEAKER: You look at them
23	<b>Q. All right. So focusing on Elite X E?</b>		
24	A. EliteXC, they were a publicly traded		
25	company, right? Maybe it's not the one I'm thinking		

1        DANA WHITE - HIGHLY CONFIDENTIAL 2 more as like developmental leagues? 3        DANA WHITE: Yeah, they're like the 4 Triple A. 5        (End of video clip.) 6 BY MR. DELL'ANGELO: 7        Q. Were you able to hear at the beginning of 8 that, Mr. White, that you were asked, can I have your 9 thoughts on Bodog and EliteXC. 10      A. Yes. 11      Q. So was that you depicted in the video? 12      A. Yes. 13      Q. And did you say that? 14      A. A younger me. 15      MR. ISAACSON: I'll object to did you say 16 that because we haven't said what "that" is. And I'm 17 going to object to the use of this on the additional 18 grounds that I can't hear some of it, the court 19 reporter can't make an accurate transcript of it, and 20 I don't know what the witness can hear of it. We can 21 obviously hear some parts of it. 22      MR. DELL'ANGELO: Again, please. 23      MR. ISAACSON: You didn't make that clear 24 because people don't know who aren't here what can be 25 heard and what can't be heard.	190	1        DANA WHITE - HIGHLY CONFIDENTIAL 2 are asking me? 3        MR. DELL'ANGELO: I will withdraw the 4 question. 5        (Exhibit 43 was marked for 6 identification by the reporter.) 7 BY MR. DELL'ANGELO: 8        Q. Here's Exhibit 43. Would you take a look 9 at that, please. 10      Exhibit 43 is a May 29, 2008 article 11 entitled "UFC has fight on hands CBS event latest 12 challenge to MMA leader" by Beau Dior in USA Today." 13      Do you have Exhibit 4, Mr. White? 14      A. Yes. 15      Q. And if you look down at the second 16 paragraph, it refers to Kimbo Slice? 17      A. Yep. 18      Q. Kimbo Slice is a former MMA fighter, 19 correct? 20      A. Yes. 21      Q. And 2011, it goes on to say that he 22 competes in Elite Xtreme Combat. 23      Do you see that? 24      A. Yes. 25      Q. You can take a minute to read this, but I	192
1        DANA WHITE - HIGHLY CONFIDENTIAL 2 BY MR. DELL'ANGELO: 3        Q. So Mr. White, the statements that you made 4 in that video, were they statements that you believed 5 to be true at the time? 6        MR. ISAACSON: I object to the question 7 because the statements can't be heard. 8        MR. DELL'ANGELO: I believe the witness 9 testified he was able to hear them, right? 10      MR. ISAACSON: He did not testify he could 11 hear all the statements. 12 BY MR. DELL'ANGELO: 13      Q. Were you able to hear your statements in 14 the video? 15      A. I think I did. 16      Q. Okay. And to the extent -- 17      A. I don't know if I missed anything. 18      Q. To the extent that you believe you did, are 19 they statements that you believed to be true about 20 EliteXC? 21      MR. ISAACSON: Object to the form of the 22 question. We won't know what he heard or did not 23 hear. 24      THE WITNESS: And what specifically are you 25 asking about? What did I say about EliteXC that you	191	1        DANA WHITE - HIGHLY CONFIDENTIAL 2 would direct your attention to the quote a few lines 3 down where you're quoted as saying "Whether they like 4 it or not, they're the farm league," UFC president 5 Dana White says." 6        Do you see that? 7      A. Yes. 8      Q. And did you say in May of 2009 that EliteXC 9 was a farm league? 10      A. It says I said it. 11      Q. Okay. Do you have any reason to disagree 12 that in May of 2008, you viewed the UFC as a farm 13 league? 14      A. No. 15      (Exhibit 44 was marked for 16 identification by the reporter.) 17 BY MR. DELL'ANGELO: 18      Q. I'm handing you what I've marked as 19 Exhibit 44, Mr. White. There you go. 20      Exhibit 44 is an article from ESPN.com, 21 dated July 6, 2007, titled "White not worried about 22 the competition." 23      A. Yes. 24      Q. All right. And if you look toward the 25 bottom of the page, do you see, the very last line,	193

1 <b>DANA WHITE - HIGHLY CONFIDENTIAL</b> 2    it says, "ESPN The Magazine" on the first page? 3      A. Yes. 4      Q. Then if you go up, it says, "ESPN the 5    magazine" again. Then it follows, "do you watch 6    other shows." 7      Do you see that? 8      A. Yes. 9      Q. Then go up one more. "ESPN The Magazine 10   how do you feel." 11     Do see that? 12     A. Yes. 13     Q. Okay. It says: 14        "ESPN The Magazine: How do you 15    feel about the IFL, Bodog, EliteXC 16    and the other competition popping 17    up?" 18     Do you see that? 19     A. Yes. 20     Q. Would you read your answer, please. 21     A. "It's good for us. I don't 22    Look at those guys as competition at 23    all. They're nowhere near the 24    league that we're in. I need shows 25    like this. They're the feeder	194	1 <b>DANA WHITE - HIGHLY CONFIDENTIAL</b> 2    said I'm totally scared of all these guys and I'm 3    worried about them because you are talking about IFL 4    who those guys had a lot of money, and the guy from 5    Bodog, another criminal, but he had a lot of money. 6    BY MR. DELL'ANGELO: 7      Q. Just so I'm clear, are you saying that take 8    the time in 2007 that you were scared about EliteXC 9    and Bodog as competing promotions to the UFC? 10     A. Well, you're insane if you don't worry 11    about your competition. You absolutely have to worry 12    about your competition. 13     Q. And so, was EliteXC and Bodog competition 14    that you were concerned about in 2007? 15     A. Yeah. So Bodog, this guy had nothing but 16    cash. The guy lived on an island somewhere, Calvin 17    Ayre, who was doing illegal gaming and was offering 18    guys huge money just to fly out and hang out with him 19    on the island. And yeah, you got to. You got to 20    worry about that. 21     Q. So you were legitimately concerned about 22    Bodog as a competitor as well? 23     A. Definitely. 24     Q. They're not in business anymore, right? 25     Let me withdraw that. They're not in the	196
<p style="text-align: center;">195</p> <p>1       <b>DANA WHITE - HIGHLY CONFIDENTIAL</b> 2    leagues. All the guys who fight in 3    those shows aspire to be in the UFC 4    some day. They're creating all the 5    UFC talent of tomorrow."</p> <p>6      Q. Did you say that in July of 2007? 7      A. I don't know.</p> <p>8      Q. Any reason that you disagree that that 9    was -- well, withdraw that.</p> <p>10     Was that true in July of 2007?</p> <p>11     MR. ISAACSON: Objection to form.</p> <p>12     THE WITNESS: Any reason not to believe it 13    was true?</p> <p>14     BY MR. DELL'ANGELO:</p> <p>15     Q. Withdraw again.</p> <p>16     Yeah. Do you believe that was true in July 17    of 2007?</p> <p>18     MR. ISAACSON: Objection to form.</p> <p>19     THE WITNESS: Should I said I'm horrified 20    and terrified of all this competition?</p> <p>21     BY MR. DELL'ANGELO:</p> <p>22     Q. I'm just asking for the truth, Mr. White.</p> <p>23     A. It's the truth.</p> <p>24     MR. ISAACSON: Objection to form.</p> <p>25     THE WITNESS: The truth is I should have</p>	195	<p style="text-align: center;">197</p> <p>1       <b>DANA WHITE - HIGHLY CONFIDENTIAL</b> 2    MMA promotion business, correct?</p> <p>3      A. I'm not sure, but I think he's in prison, 4    so yeah, it would be pretty tough for him to be in 5    business.</p> <p>6      Q. I'm asking about the business itself. Do 7    you know if Bodog is still promoting MMA events?</p> <p>8      A. I don't think so. I don't know, though.</p> <p>9      Q. Okay.</p> <p>10     A. He could be. I think he's in prison.</p> <p>11     Q. Affliction entertainment, is that an MMA 12    promotion created by Affliction clothing?</p> <p>13     A. Yes.</p> <p>14     Q. And was Affliction clothing in the business 15    of sponsoring MMA fighters?</p> <p>16     A. Yes.</p> <p>17     Q. And did Affliction clothing ever sponsor 18    fighters in the UFC?</p> <p>19     A. Yes.</p> <p>20     Q. And did Affliction clothing sponsor UFC 21    fighters at the time that Affliction Entertainment 22    was promoting MMA events?</p> <p>23     A. Yes.</p> <p>24     Q. And when did you first learn that 25    Affliction was going to start promoting MMA events?</p>	197